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21 January 2005

Mr. Ildefonso Acosta
U.S. Environmental Protection Agency
290 Broadway - 18th Floor
New York, NY 10007-1866

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Subject: Removal Assessment
Work Assignment No.: 135, Millipore Cidra, Inc.
Contract No.: 68-W-00-121

Dear Mr. Acosta:

Weston Solutions, Inc. (WESTON), is pleased to submit the Removal Assessment for the Millipore Cidra, Inc. (Millipore), site (CERCLIS ID No. PRD091198366). Millipore is an active filter and membrane manufacturing facility located at State Road 172, Km 7.6, Cidra, Puerto Rico. The site occupies approximately 30.5 acres in a mixed residential, commercial, and light industrial area. The Millipore facility consists of a main building used to house manufacturing and warehousing facilities; aboveground storage tanks (ASTs) used to store solvents (raw material) such as acetone and ethanol; a former hazardous waste storage area (HWSA) now used as a carpentry shop; an active HWSA; and an on-site wastewater treatment plant (WWTP). After treatment, wastewater is piped to a subsurface leachfield situated on the eastern portion of the facility. A small stream that originates on site has been impounded in order to store water for fire control.

Background information obtained from the Puerto Rico Environmental Quality Board (PREQB) indicates that inadequate operation of the WWTP has resulted in the discharge of wastewater to the fire control pond. The on-site stream exits the pond and flows south to surface water bodies utilized as fisheries and for drinking water.

Observations made by Region 2 SAT during a December 2004 on-site reconnaissance of Millipore indicated that hazardous waste is stored in a clean, well maintained storage area. This storage area is roofed, fenced, and surrounded by curbing to contain spills. The WWTP appeared to be operating normally and there were no visible signs of soil contamination. The former leachfield where the past discharges occurred has been removed from service. Wastewater is now piped to a new leachfield on the eastern portion of the property.





Although residual soil/sediment contamination from past discharges may be present, exposure to hazardous substances by nearby residents, trespassers, or workers is unlikely, as the site is active and access is restricted. The entire Millipore facility was observed to be clean and well maintained. Thus, a removal action does not appear to be warranted.

If you have any questions, please contact me at (732) 417-5828.

Very Truly yours,

WESTON SOLUTIONS, INC.

A handwritten signature in black ink, appearing to read "W. Scott Butterfield".

W. Scott Butterfield, CHMM
SAT Program Manager

enclosure: Removal Assessment Checklist

cc: S. Snyder, SAT PM
site file